

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

JUSTIN DYE,	:	
	:	
Plaintiff	:	
	:	CIVIL ACTION
v.	:	FILE NO. 1:18-cv-02122-WSD
	:	
AMDOCS DEVELOPMENT	:	<b>JURY TRIAL DEMANDED</b>
CENTRE INDIA, LLP, and	:	
SAMRAT TAWARE,	:	
	:	
Defendants	:	

**SECOND AMENDED COMPLAINT**

NOW COMES Plaintiff JUSTIN DYE and files this, his Second Amended Complaint, in the above-styled action, showing the court as follows:

1.

Plaintiff voluntarily subjects himself to the jurisdiction and venue of this court by filing suit in the above-styled forum. He brings this action in his individual capacity.

2.

Defendant SAMRAT TAWARE resides outside the United States and is believed to reside in the country of India. Defendant Taware resides at SIDIW of



Mohanra, AddAIP-Lakhewadi, Malegaon BK. Tal-BARAMATI, Dist-Pune and will be served in strict accordance with The Hague Convention.

3.

Defendant AMDOCS DEVELOPMENT CENTRE INDIA, LLP is a foreign corporation domiciled in the country of India and may be properly served with process in strict accordance with The Hague Convention at its principal place of business located at CyberCity Tower 2, Magarpatta City, Hadapsar, Pune 411013, India.

4.

This Court has subject matter jurisdiction over the matters at issue.

5.

Defendants are subject to the jurisdiction of this court.

6.

Venue for this action is proper.

7.

At approximately 1:00 pm on March 25, 2017, Plaintiff Justin Dye (hereinafter "Plaintiff") was driving his 2009 Honda Accord southbound on Georgia State Road 400.

8.

At the same time, Defendant Samrat Taware (hereinafter “Defendant Taware”) was driving a Ford Fiesta rental car southbound on Georgia State Road 400.

9.

Defendant Taware, who was behind Plaintiff’s vehicle, did not slow down and struck Plaintiff’s vehicle at a high rate of speed.

10.

Defendant Taware followed too closely.

11.

Defendant Taware was negligent.

12.

Defendant Taware’s negligence was the proximate cause of the collision between Defendant Taware’s vehicle and Plaintiff’s vehicle.

13.

As a direct and proximate result of Defendant’s negligence, Plaintiff has suffered bodily injury and has endured physical, mental and emotional pain and suffering.

14.

Plaintiff will continue to experience physical, mental and emotional pain and suffering in the future.

15.

As a direct and proximate result of Defendant's negligence, Plaintiff has incurred medical expenses and lost wages.

16.

As a direct and proximate result of Defendant's negligence, Plaintiff will incur future medical expenses and lost wages.

17.

Plaintiff is entitled to an award of his past and future pain and suffering and mental distress and his medical expenses and lost wages incurred as a result of Defendant's negligence.

18.

At the time of the collision with Plaintiff, Defendant Taware was acting in the course and scope of his employment for Defendant Amdocs Development Centre, LLP (hereafter "Defendant Amdocs")

19.

Defendant Amdocs is responsible for the negligent actions and/or omissions of Defendant Taware with regard to the collision described in this Second Amended Complaint under the doctrines of agency and/or apparent agency, *respondeat superior*, and/or vicarious liability.

**WHEREFORE**, Plaintiff prays for the following:

- a. That the Summons shall issue and that Defendants be served with the Summons and a copy of this Second Amended Complaint as provided by law;
- b. That Plaintiff obtain judgment against Defendants for compensatory damages, including, but not limited to, all medical expenses, all lost income, and all past, present, and future physical, mental and emotional pain and suffering;
- d. That Plaintiff be granted a trial by jury as to all triable issues in this cause; and
- f. For such other and further relief as this Court deems just and equitable under all circumstances alleged and contained herein.

Respectfully submitted this 22<sup>nd</sup> day of October, 2018.

/s/ Matthew T. Wilson  
Adam P. Princenthal  
Georgia Bar No. 588219  
Matthew T. Wilson  
Georgia Bar No. 558420

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**CERTIFICATE OF SERVICE**

This is to certify that I have this day served the following counsel of record with a true and correct copy of “**PLAINTIFF’S SECOND AMENDED COMPLAINT.**” by depositing said copy in the United States Mail, with sufficient postage affixed thereon, and properly addressed to the following:

Gene A. Major, Esq.  
Richard W. Brown, Esq.  
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This 22<sup>nd</sup> day of October, 2018.

/s/Matthew T. Wilson  
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